

## **REMARKS**

The applicants hereby affirm their election to prosecute claims 1-11. Claims 12-18 have been withdrawn from consideration.

Claims 1-11 are at issue in the instant application. Claims 1-5, 7-9, and 11 were rejected as anticipated by Majumdar et al., and claims 6 and 10 were rejected as obvious over Majumdar et al. in view of McCarthy et al. and Chen.

The applicants respectfully traverse the rejection of independent claim 1 as anticipated by Majumdar et al. Majumdar et al. does not disclose a semiconductor power module including an insulator having an electrically insulating property and thermal conductivity, as recited by claim 1 of the instant application. The examiner incorrectly contends on page 3 of the official action that the heat sink disclosed by Majumdar et al. is electrically insulating. To the contrary, the heat sink disclosed by Majumdar et al. is made of metal and, thus, is highly electrically conductive. See, e.g., col. 8, lines 23-25. Accordingly, because Majumdar et al. fails to disclose every limitation of claim 1, claim 1 is not anticipated thereby.

Furthermore, none of Majumdar et al., McCarthy et al., and Chen discloses or suggests the use of an insulator having an electrically insulating property and thermal conductivity within a semiconductor power module, as recited by claim 1 of the instant application. In fact, as noted above, Majumdar et al. discloses the use of a metal, which is highly electrically conductive, for a heat sink. Similarly, Chen teaches the use of an electrically conductive metal to form a heat spreader. Thus, both Majumdar et al. and Chen teach away from the instant invention, which utilizes an insulator having an electrically insulating property and a thermal conductivity.

McCarthy et al. fails to overcome the deficiencies of Majumdar et al. and Chen noted above. McCarthy et al. merely discloses a heat detecting circuit and does not disclose or suggest any structure remotely similar to the insulator recited by claim 1 of the instant application.

Thus, whether taken individually or in combination, Majumdar et al., McCarthy et al. and Chen fail to teach or suggest all of the recitations of independent claim 1 and, as a result, claim 1 cannot be rendered obvious thereby. It is clear that a *prima facie* case of obviousness cannot be established where all the limitations of a claimed combination are not taught or suggested by the prior art. See *In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974). See also, MPEP 2143.03. Accordingly, the applicants submit that claim 1 and claims 2-11 dependent thereon are now in condition for allowance.

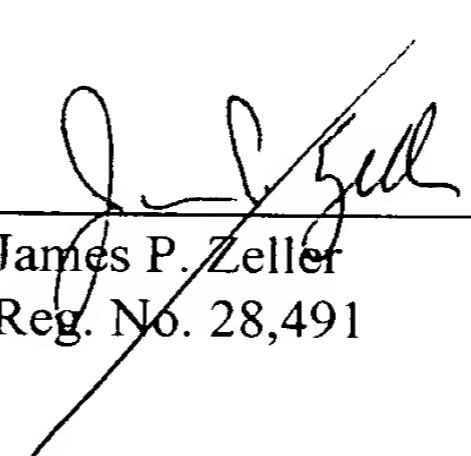
For the foregoing reasons, reconsideration and withdrawal of the rejections of the claims and allowance thereof are respectfully requested.

Should the examiner wish to discuss the foregoing, or any matter of form, in an effort to advance this application toward allowance, he is urged to telephone the undersigned at the number indicated below.

Respectfully submitted,

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